

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

PERIODIC REPORTING
(PROPOSAL TWO)

Docket No. RM2022-8

REPLY COMMENTS OF THE UNITED STATES POSTAL SERVICE
REGARDING PROPOSAL TWO
(August 29, 2022)

On August 26, 2022, initial comments in this docket were filed by the Public Representative. The Postal Service hereby offers its reply comments to the Public Representative.¹ In addition to recommending that Proposal Two be approved (PR Comments at 10, 14), the Public Representative identified a minor typographical error in the Postal Service's program that replicated the Commission's variabilities calculated on FY2019 data in Docket No. RM2020-2 (*id.* at 13). The Postal Service agrees with the Public Representative that eliminating the typographical error confirms that the program correctly implements the MEDBPAC variability method, thus eliminating any possible concern about that replication. The Commission can therefore be confident that the Postal Service correctly implemented the Commission's methodology when applying it to the FY 2022 data in Proposal Two.

This minor correction in the *FY 2019 data* replication analysis, though, has no effect on the Postal Service's variability analysis based on *FY 2022 data*, or the

¹ A separate motion has been submitted by the Postal Service today seeking leave to file these reply comments. Additionally, it may be noted that GCA also filed comments (on August 29), but the GCA comments support approval of Proposal Two without conditions, and no response is necessary.

quantitative results upon which the variabilities advocated in Proposal Two are premised. There is, therefore, no reason that the Commission's approval of Proposal Two should be conditioned on any further actions by anyone.

Conclusion

For the reasons stated above, Proposal Two as submitted is ripe for review and should be approved at this time.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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